

JS-6

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

TICKETMASTER L.L.C., a Virginia
limited liability company,

Plaintiff,

vs.

HIGS TICKETS, INC., a Massachusetts
corporation, HIGS CITYSIDE
TICKETS, INC., a Massachusetts
corporation, JOHN HIGGINS,
PATRICK HIGGINS, and DOES 1
through 10, inclusive,

Defendants.

Case No. CV-13-7630 ABC (JCx)

Hon. Audrey B. Collins

**[PROPOSED] ORDER RE:
PERMANENT INJUNCTION
AND DISMISSAL WITH
PREJUDICE**

1 WHEREAS, plaintiff Ticketmaster L.L.C. (“Ticketmaster”) and defendants
2 Higs Tickets, Inc., Higs Cityside Tickets, Inc., John Higgins, and Patrick Higgins
3 (“Defendants”) have filed a stipulation stating that Ticketmaster and Defendants
4 have entered into a settlement agreement that provides, among other things, for the
5 mutual release of claims, entry of a permanent injunction against Defendants in
6 accordance with the terms stated in the stipulation, and the dismissal of all claims
7 against Defendants with prejudice.

8 IT IS HEREBY ORDERED AS FOLLOWS:

9 1. Each Defendant and all those under their respective direction or
10 control or acting in concert with any of them, including without limitation each
11 Defendant’s agents, employees, successors, and assigns, are permanently enjoined
12 from:

13 a. Creating or using computer programs or automated devices to
14 search for, reserve, or purchase tickets from www.ticketmaster.com (the
15 “Website”), faster than human beings can manually enter into the Website the
16 information needed to obtain information about, reserve, or purchase tickets from
17 the Website;

18 b. Creating or using computer programs, automated devices, or
19 other methods to circumvent CAPTCHA or any other software program integrated
20 into the Website’s customer interface to distinguish computer programs or
21 automated devices from human customers;

22 c. Infringing any of Ticketmaster’s copyrights in the course of
23 purchasing or attempting to purchase tickets from the Website;

24 d. Exceeding web page request limits, reserve request limits, or
25 per-event ticket limits that are disclosed or otherwise posted on the Website; and

26 e. Conspiring with anyone else to engage in any of the above
27 activities.
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